



December 18th, 2006

The Honorable Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12th Street SW  
Room 8 - B201  
Washington, D.C. 20554

RE: Letter of Support for the M2Z Networks Application from the Electronic Retailing Association

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The Electronic Retailing Association (ERA) is the trade association for companies who use the power of direct response to sell goods and services to the public on television, online, and on radio. Amongst ERA's primary objectives is to serve as a cohesive voice in Washington and in state capitols across the country to speak out on a variety of issues that ERA believes will impact the success of our members. Universal access to reliable, affordable broadband connectivity is one such issue. Access to the internet is a crucial both to our members and to the consumers they seek to reach.

Our economy is becoming more and more dependent on electronic commerce. In the second quarter of 2006 alone \$26.3 billion dollars worth of retail transactions were completed online according to the U.S. Census Bureau. Thus, the Internet is a tremendously powerful tool for retailers. In the coming years the ability of entrepreneurs to harness the power of the internet will be integral to their success. This means that connections are supremely important, both on the consumer and retailer sides of transactions. M2Z Network, Inc. has presented a highly feasible plan for a reliable, affordable nationwide wireless broadband data network that will get many more consumers and entrepreneurs connected to the Internet.

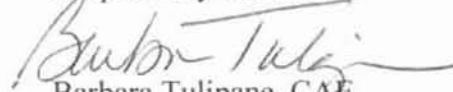
ERA's own internal research further elucidates the importance to our industry of getting more people connected to the Internet. In 2005 the electronic retailing industry reached \$323 billion dollars in sales. Of that total \$70 billion, or 22% of the total figure, came from online retailing activities. In 2003, Internet sales accounted for \$42 billion, or only 16% of the \$256 billion total for the direct response industry. With a 6% growth in only two short years, electronic retailers are watching the Internet segment of our business very closely. In order for online sales to continue growing, though, the pool of potential customers must also continue to grow. M2Z Networks will provide a new pathway for entrepreneurs and consumers alike to get online and begin taking advantage of opportunities in e-commerce.

Simply getting people connected is not the only way that M2Z can assist ERA's members, however. Amongst the surfeit of tools that the Internet makes available to online entrepreneurs, the ability to market directly to the end consumer in an affordable and direct way, through e-mail, websites and advertising, is one of the most powerful. Unfortunately, research suggests that only a slim majority of small and independent business are taking advantage of these tools. The National Federation of Independent Businesses reports that only 57% of small business owners use the internet for business related activities. Only 35% have company websites. This further exemplifies the need for affordable, reliable solutions to the significant, and often times insurmountable, cost of broadband connectivity for business in today's marketplace. These realities impact many of our Supplier Members. This class of members is distinct within ERA as their business is not based on direct retailing to the end consumer but to other retailers. Thus, if more small and independent businesses had access to the internet they would be able to take advantage of the wide array of products that our Supplier Members are making available online everyday.

Finally, ERA has taken a strong stand on the issue of Network Neutrality. We at ERA believe very strongly that traffic on the Internet should not be biased, ranked or favored by any network provider in order to bolster their own revenues. ERA and our Online Retail Alliance has been a leader in the fight to ensure equality of access to the Internet for all people, entrepreneurs and consumers alike. In that fight it has become increasingly obvious that competition at the network level is extremely important. Network providers will not be able to degrade or deny service to any Internet user if they know that it will cost them subscribers to a rival network that does not take part in neutrality violating activities. This is another important reason why ERA supports the M2Z Networks spectrum application; to spur competition at the network level.

With these considerations in mind, ERA urges the Federal Communications Commission to begin the formal process towards the approval of the M2Z Networks' license application.

Respectfully Submitted,



Barbara Tulipane, CAE  
ERA President and CEO

cc: Commissioner Michael J. Copps  
Federal Communications Commission

Jonathan S. Adelstein  
Federal Communications Commission

Commissioner Deborah Taylor Tate  
Federal Communications Commission

Commissioner Robert M. McDowell  
Federal Communications Commission